

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Dahvoughn T Sadler	:	Case No.: 21-10274-elf
	:	
Debtor	:	Chapter 13

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**MOTION FOR AUTHORITY TO SELL REAL PROPERTY FREE AND CLEAR OF  
LIENS AND ENCUMBRANCES**

**NOW INTO COURT COMES**, Dahvoughn T Sadler, hereinafter referred to as “Debtor”, and brings this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof avers the following:

1. Debtor commenced the instant Chapter 13 matter on February 4, 2021 by filing a Voluntary Petition.
2. The Chapter 13 Bankruptcy has not yet been confirmed.
3. The subject real property is located at 804 Logan Avenue Croydon, PA 19021 (hereinafter referred to as “the property”) and is jointly-owned by the Debtor and her sister, Ellen Martin.
4. Debtor believes it to be in his best financial interest to sell the property.
5. In furtherance of the sale, Debtor retained the services of Melanie C Elliott, a licensed realtor with Century 21 Veterans-Newtown.
6. On or about March 22, 2021, Debtor, by and through his realtor entered into an Agreement of Sale of the property in the amount of \$310,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**

7. The settlement date for the sale of the subject property is scheduled for April 30, 2021.

8. The Buyers, Alan W. Flake and Octavia M. Bryant, are not an insiders of the Debtor and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds the Debtor's intend to satisfy any and all mortgages and liens including Citizens Bank, N.A in the approximate amount of \$155,128.95 based on the Proof of Claim filed in this case.

10. At the time of filing the instant Motion, a Settlement Statement is not yet available; however, the Debtor is desirous of receiving the total exemption in the sum of \$25,150.00 plus any sums remaining after all claims are satisfied from the sale proceeds.

**WHEREFORE**, Debtor, respectfully requests that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: April 1, 2021

/s/Brad J. Sadek, Esq

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